

U.S. DISTRICT COURT
SAN JUAN, P.R.
2022 JUL 13 AM 9:30

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO
TITLE III-PROMESA-COURT**

In re:

**The Financial Oversight and Management
Board For Puerto Rico,
as representative of
The Commonwealth of Puerto Rico, et al.,
Debtors**

Title III-PROMESA: # 17 BK 3283-LTS

Re: ECF Nos. 19525, 19869

US District Court of PR-# 3:20 -cv-01360-FAB
-Violation of Civil Rights -42 USC SECTION 1983
Civil action for Deprivation of Rights

US COURT OF APPEAL-FIRST CIRCUIT #21-1472

JUAN MANUEL CRUZADO-LAUREANO

Movant

-against-

**The Financial Oversight and Management
Board for Puerto Rico, as representative of
The Commonwealth of Puerto Rico
Respondent**

**MOTION REQUESTING EXPEDITED ATTENTION TO THE LEGAL RESOURCE FILED
ON FEBRUARY 7, 2022 BY JUAN MANUEL CRUZADO-LAUREANO IN THE CASE OF
TITLE III- PROMESA : #17 BK 3283-LTS AGAINST THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD FOR PUERTO RICO.**

To the Honorable United States District Court Judge Laura Taylor Swain:

Appears before this Honorable **TITLE III COURT OF PROMESA**, Juan Manuel Cruzado-Laureano- *the Movant*- exercising his right to legal self-representation (**PRO-SE**), Exhibits, Alleges and Request:

- 1- On February 7, 2022, the deadline established by this Honorable Court, *Movant* filed its final response to the brief prepared by the attorneys representing the *Financial Oversight and Management Board for Puerto Rico* in Case #17 BK 3283-LTS before this Court. At the time writing this claim for expedited attention in Case #17 BK 3283-LTS, more than 5 months have passed since the parties submitted all the final arguments and this Honorable Court has still not issued the opinion requested by the Panel of the First Circuit of Appeals on the application or not of the *automatic stay* of **PROMESA** to the lawsuit filed by *Movant* in the District Court of the US of PR #3:20-cv-01360-FAB.
- 2- We respectfully point out to the Honorable Court that the **PROMESA** Law is clear and establishes that only **Debtors** will be covered under the *Automatic Stay* of said Law. According to the division of powers established in the Constitution of the Commonwealth of PR, the Comptroller's Office is part of the Legislative Power. The bankruptcy filed by the Government of the Commonwealth of PR (Primary Government) under Title III of the Federal **PROMESA** Act, was filed through the Financial Oversight and Management Board of PR (The **BOARD**). The **BOARD** at its meeting of September 30, 2016, determined to submit under the bankruptcy of the Primary Government to 63 entities (Executive Power) and any subsidiary of these. In the 63 entities covered by **PROMESA**'s automatic *Stay*, *the Office of the PR Comptroller is not included*.
- 3- The "far-fetched" discussion by the attorneys of the New Progressive Party (PNP) Government frivolously alleging that the *Stay* of Title III of **PROMESA** is applicable to a government agency that was not included by The **BOARD**

at the time of submitting the bankruptcy of the Government of PR in the 2017, nor in any subsequent amendment to said filing, is part of a political plan of the PNP. With this plan, the PNP seeks to defeat in this Court the demand for justice in the face of the vile and criminal acts perpetrated against Movant by the former Comptroller of PR, Manuel Díaz Saldaña, who unconditionally put at the service of the political strategies of the PNP.

- 4- The position expressed so far by the First Circuit Panel on the alleged jurisdiction of the *Automatic Stay* of Title III of PROMESA to Lawsuit 20-01360, forces this Honorable Court to decide whether or not it agrees with said position of the First Circuit. The Movant asks this Honorable Court to grant an Argumentative Hearing, face-face, where the issue implicit in that position of the First Circuit can be discussed, that the PROMESA Law abolished the division of Powers established in the Constitution of the Commonwealth of PR. If the Argumentative Hearing is granted, Movant requests that the Court provide the services of a translator for his speech.

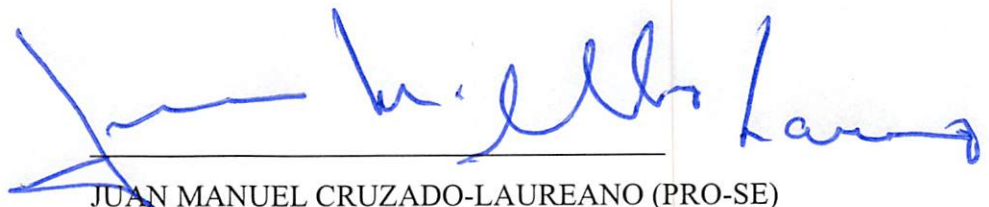
This Honorable Court must take notice that the Federal Department of Justice through the voice of the Solicitor General, *Elizabeth B. Prelogar*, waived to answer on January 26, 2022 Certiorari #21-6910¹ filed by the Movant, where it is stated that it, He was the victim of a "*Lawfare Case*" orchestrated by the PR US Attorney's Office in 2001-2002. The current address of the PR US Attorney's Office, under W. Stephen Muldrow, refused to answer Civil Lawsuit # 22-cv-1181(WGY) of April 19, 2022, where Movant makes a multi-million dollar claim for damages caused to him and his family, with the *Lawfare Case* orchestrated against him by the PR US Attorney's Office in the years 2001-2002. Before the Honorable Judge William G. Young is filed by Movant the request for a default

judgment against the US Attorney's Office, for the refusal to answer the Lawsuit 22-cv-1181(WGY) whose cause of action is the *Bivens Action Law*, for the violations of fundamental rights committed against him by the direction of the US Attorney's Office of PR in the years 2001-2002.

For all of the foregoing this Honorable Court is very respectfully requested to attend to the case urgently, because the delay in issuing an opinion on the matter raised seriously harms justice.

VERY RESPECTFULLY SUBMITTED, today July 13, 2022, in Vega Alta, PR:

¹ The letter of resignation is included as an annex # 1.



JUAN MANUEL CRUZADO-LAUREANO (PRO-SE)

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Proof of Service:

We hereby certified that on the same day that the "MOTION REQUESTING EXPEDITED ATTENTION TO THE LEGAL RESOURCE FILED ON FEBRUARY 7, 2022 BY JUAN MANUEL CRUZADO-LAUREANO IN THE CASE OF TITLE III- PROMESA : #17 BK 3283-LTS AGAINST THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO." was filed on the Clerk's Office of the Federal District Court of PR, it was mailed to BUFETE MARINI PIETRANTONI MUÑIZ LLC, whose address on record in the documents is : Carolina Velaz-Rivero, 250 Ponce de Leon Ave., Suite 900 San Juan PR 00918.